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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF NEVADA**

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13 UNITED STATES OF AMERICA

14 Plaintiff,

15 vs.

16 BENJAMIN GALECKI, et al.

17 Defendant.

18 CASE NO. : 2:15-cr-00285-KJD-PAL-2

19 **UNOPPOSED MOTION TO EXTEND**  
20 **PRE-TRIAL MOTIONS DEADLINE**  
21 **(FIRST REQUEST)**

22 COMES NOW Defendant BENJAMIN GALECKI by and through CJA counsel  
23 and hereby timely files this Unopposed Motion to Extend Pre-Trial Motions Deadline  
24 (First Request). This Motion is made and based upon the below justification, all  
25 papers and pleadings on file herein, along with any oral argument deemed necessary  
26 by this court:

27 1. The current Joint Pretrial Order makes June 15, 2016 the deadline for  
28 Defendants to file pre-trial motions.

29 2. A close family friend and prior legal assistant to Counsel for Benjamin  
30 Galecki, passed away suddenly this weekend after her cancer spread. She was  
31 admitted to the hospital on or about Friday June 10, 2016 and passed away in the  
32 early morning hours of June 12, 2016.

33 3. This event interrupted Counsel's scheduled time to complete pre-trial  
34 motions for the above titled case.

4. Counsel endeavored to complete the pre-trial motions but needs additional time.

5. Counsel contacted Government counsel who graciously agreed to a seven (7) day extension of time.

6. This will allow counsel time to complete the proposed motions, run them by Government counsel for purposes of a 'meet and confer', and then to file same.

7. This unopposed request for additional time is brought in good faith and not for purposes of delay or to prejudice any party.

Dated this 15th day of June, 2016.

GAMAGE & GAMAGE

/s/ William Gamage, Esq.

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IT IS SO ORDERED THIS 28th day of June, 2016 that  
the time for filing Pre-trial is extended for Defendant Benjamin Galecki rendering  
the following pretrial motions briefing schedule:

Pre-Trial Motions	-	June 22, 2016
Response	-	July 8, 2016
Reply	-	July 18, 2016

Terry A. Teer

UNITED STATES MAGISTRATE JUDGE